

July 29, 2003

To: The Federal Communications Commission
From: Tanya J. Glazebrook
President & CEO
MedicAlert Foundation International
Re: Rules & Regulations Published July 25, effective August 25

While we applaud the efforts of the Commission to continue to protect consumers, we are concerned that the latest rulings published last week have the potential to negatively affect our 2.4 million Members in the United States. MedicAlert is a 501c3 membership organization with nearly a 50 year history of providing vital medical information about its Members to emergency responders in cases of medical crisis. As a non profit organization, we closely monitor and manage the cost of communicating with our Members and attempt to utilize the most cost effective methods of doing so, including telephone, fax and the Internet.

We have established very high standards for protecting our Member information with a long standing policy of never selling, renting, or loaning any information, including name, address and telephone number to any other organization or company. We have worked hard to develop an established business relationship with our Members. Maintaining that relationship requires regular communication, including notification of renewals, reminders to update medical and personal notification information, change in physicians or medications and many other transactions. As we add new services, our Members expect us to notify them of those services. For example, we now maintain complete details on implanted devices. Obtaining written permission from a membership base as large as ours to include faxing as an option for communication would be financially impossible.

We urge you to be clearer in your definitions and to consider the long standing relationships many membership organizations have with their Members before implementing this costly and confining new rule.

Thank you for your consideration.